CARSON McDOWELL

Anti-bribery and Corruption Statement

Purpose

This statement outlines Carson McDowell's approach to preventing bribery and corruption.

The purpose of this statement is to demonstrate the firm's commitment to the prevention, deterrence and detection of bribery and conduct its business in an honest and ethical manner and safeguard the firm's resources.

We adhere to all applicable laws relating to countering bribery and corruption. We remain bound by the laws of the UK (including but not limited to the Bribery Act 2010) and the Republic of Ireland (including but not limited to the Criminal Justice (Corruption Offences) Act 2018) regulating or prohibiting bribery and corruption ("Anti-bribery Laws"), in respect of our conduct both at home and abroad.

This statement should be read in conjunction with our Anti-bribery and Corruption policy.

Carson McDowell's approach to bribery and corruption

At Carson McDowell, we are committed to conducting our business with honesty and integrity, and we expect all employees to maintain the highest professional and ethical standards.

In line with this, Carson McDowell has a zero-tolerance stance regarding bribery and corruption. We do not offer or accept bribes, or other improper advantages, in any form, either directly or via a third party.

Oversight

Overall responsibility for ensuring that the firm adheres to its legal and regulatory requirements rests with the firm's Risk Committee.

The Director of Risk and Compliance and the Compliance Officer for Legal Practice (COLP) are responsible for the day-to-day oversight of our anti-bribery and corruption controls and processes, including dealing with concerns or investigations.

The Human Resources Manager has day-to-day operational responsibility for Whistleblowing.

Controls

In addition to our policies and procedures, Carson McDowell has various controls and processes in place to ensure prevention, detection and escalation of bribery and corruption. These include:

- Due Diligence of relevant parties, including background screening of all employees.
- Client Due Diligence for new and existing clients, including ongoing monitoring where applicable, conducted by our Central Onboarding and Ongoing Review Team.
- Relevant controls and approvals surrounding cash payments and gifting.
- Ongoing reviews of policies, procedures and processes.
- Escalation and whistleblowing processes.
- Periodic training of all employees on anti-bribery and corruption.

Training and awareness

All relevant policies and procedures are available on request, including our Anti-bribery and Corruption, Cash and Whistleblowing policies.

In addition, all employees receive mandatory Anti-bribery and Corruption training on an ongoing basis at periodic intervals.

Raising a concern

All employees are encouraged to raise concerns about any issues or malpractice that involve bribery and corruption (whether actual or suspected) through the relevant channels at the earliest opportunity. These include through the Director of Risk & Compliance and/or the COLP in respect of England & Wales matters, and if necessary, through the Whistleblowing process. Our Whistleblowing policy is available on request.

Additionally, if any client, third party or supplier of Carson McDowell wishes to report any actual or suspected incident of bribery or corruption, or indeed any other unethical behaviour, we encourage them to make us aware of this.

All reports or concerns regarding bribery and corruption will be handled with the required confidentiality.

CARSON McDOWELL

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